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12 Attorneys for Plaintiff
13 VERIGY US, INC.

14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 SAN JOSE DIVISION

17 VERIGY US, INC, a Delaware Corporation

18 Plaintiff,

19 vs.

20 ROMI OMAR MAYDER, an individual;
21 WESLEY MAYDER, an individual; SILICON
22 TEST SYSTEMS, INC., a California Corporation;
23 and SILICON TEST SOLUTIONS, LLC, a
24 California Limited Liability Corporation,
25 inclusive,

26 Defendants.

Case No. C07 04330 RMW (HRL)

**DECLARATION OF MELINDA M.
MORTON IN SUPPORT OF PLAINTIFF'S
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE DOCUMENTS UNDER
SEAL**

Judge: Honorable Ronald M. Whyte
Ctrm: 6

1 I, Melinda M. Morton, declare as follows:

2 1. I am an attorney licensed to practice law before all of the courts of the State of
3 California. I am an associate with the law firm of Bergeson, LLP, counsel of record for Plaintiff
4 Verigy US, Inc. ("Verigy" or "Plaintiff") in the above-captioned action. I have personal
5 knowledge of the facts set forth in this declaration, and, if called to do so, I could and would
6 competently testify thereto.

7 2. I submit this declaration in support of Verigy's Administrative Motion for Leave to
8 File Document Under Seal.

9 3. I have reviewed the following materials ("the Materials"):

10 (a) Portions of Plaintiff's Memorandum of Points and Authorities in
11 Support of Application for an Order to Show Cause Re: Contempt
12 Against Defendants Romi Mayder and Silicon Test Systems, Inc.
13 ("the Application").

14 (b) Exhibits A through K of the Declaration of Melinda M. Morton in
15 Support of the Application.

16 4. I have determined that these Materials (hereafter "the Materials") disclose
17 information that has been designated as "Highly Confidential—Attorneys' Eyes Only" or
18 "Confidential" by the parties under the protective order, without objection to those designations
19 (although Verigy reserves its rights to challenge such designations pursuant to the Stipulated
20 Protective Order).

21 5. The confidentiality interest of the parties therefore overcomes the right of public
22 access to the record, as a substantial probability exists that the parties' overriding confidentiality
23 interest will be prejudiced if the record is not sealed. Further, the proposed sealing is narrowly
24 tailored and no less restrictive means exist to achieve this overriding interest.

25 I declare under penalty of perjury under the laws of the United States of America that the
26 foregoing is true and correct and that this declaration was executed this 5th day of December,
27 2007 at San Jose, California.
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/s/
Melinda M. Morton